



DANIEL S. HALLAK  
ASSOCIATE  
DIRECT TEL: 516.355.9628  
DIRECT FAX: 516.355.9660  
[DHALLAK@RFRIEDMANLAW.COM](mailto:DHALLAK@RFRIEDMANLAW.COM)

February 19, 2021

**VIA ECF**

Honorable Magistrate Judge Steven Tiscione  
United States District Court  
Eastern District of New York  
100 Federal Plaza, Courtroom 710  
Central Islip, New York 11722

**Re:** *Antonio Cruz v. County of Suffolk, et al.*  
Docket No.: 17-CV-4398 (GRB)(ST); File No.: L2534

Dear Judge Tiscione:

This office represents Plaintiff in the above-referenced matter. Please accept this correspondence on behalf of the Plaintiff and Defendants to respectfully request a three-month extension of time to file the Joint Pretrial Order in this matter.

To briefly memorialize, on November 23, 2020, the parties appeared for a telephone conference with this Court to discuss the status of the settlement negotiations between the parties. On November 24, 2020, Your Honor directed the parties to file the Joint Pretrial Order for the eventual trial of this matter if the parties were unable to settle the case in the interim, with the hopes that the constraints by the Covid-19 pandemic would be alleviated by now. (DE No. 51). Unfortunately, the parties are still practically constrained by the Covid-19 pandemic but would like to continue these discussions in the near future. Accordingly, the parties respectfully request that we be permitted a three-month extension to file the Joint Pretrial Order with the hopes that we can continue settlement discussions in the near future. If Your Honor is amenable to this request, the date for the Joint Pretrial Order to be filed would be extended from February 26, 2021 to May 26, 2021. All parties consent to this application.

Thank you for your time and consideration to this matter.

Respectfully yours,  
**THE RUSSELL FRIEDMAN LAW GROUP, LLP**

By: /s/Daniel S. Hallak  
Daniel S. Hallak

DSH/dm